



Juan Antonio Lozada <juan@tximmigrationlaw.com>

Returning your file.

7 messages

Steve Kardell <skardell@kardelllawgroup.com>

Fri, Feb 21, 2020 at 5:38 AM

To: "Juan Antonio Lozada-Leoni - Ex-MoneyGram (juan@tximmigrationlaw.com)" <juan@tximmigrationlaw.com>

My office is off today, so it may be Monday before we can get this fairly voluminous file back to you. If there are any pleadings or documents you need right away, let me know and I will pull those out and send them to you.

Have you made a decision on substitution of counsel yet?

A handwritten signature in blue ink, appearing to read "SK", enclosed within a yellow rectangular border.

Steve Kardell

Board Certified Labor & Employment Law; Texas Board of Legal Specialization

KARDELL | LAW GROUP

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Exh 2

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Juan Antonio Lozada <juan@tximmigrationlaw.com>

Fri, Feb 21, 2020 at 7:09 AM

To: Alexandra Hicks <alexandra@tximmigrationlaw.com>, Richard Newman <rnewman0905@gmail.com>, Ronald Romeo <ron@romeolawfirm.com>, Steve Kardell <skardell@kardelllawgroup.com>, Theodore Garber <tgarber@txcivillitigation.com>

Steve,
Mr Romeo and Mr Garber will be probably taking over for you, they are applying for admission at the Eastern district and will need to get up to speed with the case, I expect you to continue to move the rock on this case until they are formally in charge and you are no longer the lead counsel, as it is your responsibility to do. As far as I am concerned, you are still responsible for responding and timely filing what needs to be file until the court signs on your withdrawal and the new litigation team is in place, please cc Mr Romeo, Mr Garber, Mr Newman and Ms Hicks in all future communication, I will need copies of every email you have exchanged with opposing counsel and Mr Weber, thank you, Juan Lozada

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Juan Antonio Lozada, Attorney at Law

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The Law Office of Juan Antonio Lozada, PLLC

Exh 2

Steve Kardell <skardell@kardelllawgroup.com>

Fri, Feb 21, 2020 at 10:21 AM

To: Juan Antonio Lozada <juan@tximmigrationlaw.com>

Cc: Alexandra Hicks <alexandra@tximmigrationlaw.com>, Richard Newman <rnewman0905@gmail.com>, Ronald Romeo <ron@romeolawfirm.com>, Theodore Garber <tgarber@txcivillitigation.com>

Moving the rock on your behalf in the interim	I think what you mean here is that we make sure that pending your lawyer's making an appearance in the case, that we maintain all your discovery positions, wherever possible.	That sounds reasonable but Bob and I may need to go ahead and file something with the court to give the court a head's up of the fact that both he and I are withdrawing. I will check with him on this and see what he recommends.
Sending all copies of all emails to everybody.	Not a problem, although you may have most of these copies anyway.	
Your office lawyers taking over the case.	This is probably a wise move on your part. As I mentioned to you earlier, since your law practice earnings have basically mitigated your damages, the damages in this case have been essentially attorney's fees, for some time. This way your office lawyers can ameliorate that problem (assuming you win).	To that point, my only closing advice to your young lawyers would be to try to keep out of evidence your phone call recordings with JMG, especially since you're going to be in front of a very rural, very unsophisticated jury in Sherman, and those juries really look askance at this type of conduct.



Steve Kardell

Exh 2

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Juan Antonio Lozada <juan@tximmigrationlaw.com>
To: Steve Kardell <skardell@kardelllawgroup.com>

Fri, Feb 21, 2020 at 10:58 AM

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Cc: Alexandra Hicks <alexandra@tximmigrationlaw.com>, Richard Newman <rnewman0905@gmail.com>, Ronald Romeo <ron@romeolawfirm.com>, Theodore Garber <tgarber@txcivillitigation.com>

Steve,
Not really sure how to take this message, I am having to take over this litigation because you screwed it up and after 2 years with my case you still don't know the facts, your deposition of JMG hurt us, you missing deadlines and keeping me in the dark about a bunch of stuff you were not doing has placed us in a bind, we will now have to clean up your mess and try to save what we can, please spare me the CYA emails, letting opposing counsel know BOB is withdrawing will hurt us, you know that because you said so earlier, withdrawing without a team in place will also hurt our case, you also know that, Juan
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Steve Kardell <skardell@kardelllawgroup.com>

Fri, Feb 21, 2020 at 11:30 AM

To: Juan Antonio Lozada <juan@tximmigrationlaw.com>

Cc: Alexandra Hicks <alexandra@tximmigrationlaw.com>, Richard Newman <rnewman0905@gmail.com>, Ronald Romeo <ron@romeolawfirm.com>, Theodore Garber <tgarber@txcivillitigation.com>

I wish i had time to rebut some of your crazy statements point by point, but, in the interest of time, where did you get this crazy idea?

"letting opposing counsel know BOB is withdrawing will hurt us"

Are you saying we have indicated this to opposing counsel?

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Juan Antonio Lozada <juan@tximmigrationlaw.com>

Fri, Feb 21, 2020 at 11:39 AM

To: Steve Kardell <skardell@kardelllawgroup.com>

Cc: Alexandra Hicks <alexandra@tximmigrationlaw.com>, Richard Newman <rnewman0905@gmail.com>, Ronald Romeo <ron@romeolawfirm.com>, Theodore Garber <tgarber@txcivillitigation.com>

Unfortunately, everything I said in my last email is well documented, ad hominem attacks have always been your thing, FYI, most people can see through It pretty easily

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Steve Kardell <skardell@kardelllawgroup.com>

Fri, Feb 21, 2020 at 11:48 AM

To: Juan Antonio Lozada <juan@tximmigrationlaw.com>

Cc: Alexandra Hicks <alexandra@tximmigrationlaw.com>, Richard Newman <rnewman0905@gmail.com>, Ronald Romeo <ron@romeolawfirm.com>, Theodore Garber <tgarber@txcivillitigation.com>

You didn't answer my question . Are you saying that we have disclosed the fact that Bob and I are leaving to opposing counsel?

Exh 2

5/17/2020

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